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U.S. BANKRUPTCY COURT
FILED
TRENTON, NJ

2023 MAY 18 P 12:07

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

JEANNE A. NAUGHTON


DEPUTY CLERK

IN RE:) Case No. 22-17381
Michael P. Siano Estate)
) Chapter 7
)
)
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)

ANWSER TO TRUSTEES REPLY TO MOTION TO DISSMISS AND FOR
RECONSIDERATION OF ORDER APPROVING RETENTION OF AJ WILLNER

Michael Patrick Siano's response to Nancy Isaacson's response states the following;

Motion to dismiss

1. I just received this response from the trustee via email on May 16, 2023.
2. Michael Patrick Siano is not a trained attorney and can not be held to the same standards as this response written by the chapter 7 trustee seems to be doing.
3. Since I am not a licensed attorney and did not know any better at the time, I was under the belief that when I explained on the record during the last hearing that once I finally told my family I was in bankruptcy court, that my father Tom Siano told me he would repay me for a loan of money in the amount of 12 thousand dollars that I had previously lent to him that I had presented cause to dismiss the case voluntarily.
4. This "loan" had taken place about 8 years ago when at the time I was making a substantial amount of income.
5. I had never asked my father for those funds and had not even thought about it in years.
6. On the record I called it an unforeseen circumstance and I believed when I wrote that phrase on the motion package, I received from the Courts chambers that it was known what I was talking about. I also mentioned this on the first motion to voluntarily dismiss that I had written up, and was subsequently told that I must fill out a motion package.
7. I believe the fact that I have the funds available for these claims and to pay the fee to cover the cost of the trustee is sufficient cause to dismiss the case.

Motion for reconsideration

1. I will reiterate that I am not a trained lawyer and was of the belief that since I wanted to settle the claims in full that there was no need to fill out an amended schedule C to assert the proper exemption.
2. As I have already explained to the court and Miss Isaacson in my object that even though she served process via regular mail of the objection to the exemption of the Chevy Silverado, I also received a hearing date for the 11th of April, and when I called to the clerks office to confirm the dates of the hearings there was a mix up and I believed that the hearing for both matters was to be held on the 11th.
3. The trustee is trying to hold me liable as if I am a trained attorney and fully understand how to comprehend the docket. The clerk I spoke with had a hard time understanding the docket.
4. Since an Objection was not made by myself directed towards the Trustees Objection to the Silverado Claim does not mean I was not paying attention to the bankruptcy. This is a unfounded accusation with no merit. I was not under the presumption that I had to file an objection and that speaking on the record would have been just as good. I was wrong and I know now that I should of objected on paper.
5. The amended schedule C is being mailed to the Court clerk immediately.

Michael Patrick Siano has shown this honorable court good cause for why this bankruptcy should be dismissed. I have the funds to cover the claims in full and the administrative fee for the trustee, there should be no reason for this bankruptcy to go on especially this early into it since the claims can be covered by myself. The Trustee should have no issue with this bankruptcy being dismissed as it would be prejudicial to deny the motion to dismiss. The court should allow all the claims to be paid immediately instead of going through a bankruptcy proceeding. It will incur more time man power and money on the court to continue a bankruptcy when it could simply dismiss it once I immediately pay the claims. Motion to Reconsider and Motion to Voluntarily Dismiss should be granted it is in the best interest of all parties.

Dated May 17, 2023


Michael Patrick Siano

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(732) 788-0772

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FOR THE DISTRICT OF NEW JERSEY

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)	Chapter 7
)	
)	

Certification

I Michael Patrick Siano on May 17, 2023 sent a copy of the Objection to the parties listed below.

- | | |
|--|---|
| 1. Calvary SPV I LLC
P.O. Box 4252
Greenwich CT. 06831 | 5. Capital one Auto
1680Capital one drive
Mclean, VA, 22102 |
| 2. Midland Credit Management
P.O. Box 2037
Warren, MI, 48090 | 6. American express
200 Vessey St
NY,NY, 10285 |
| 3. Pinnacle Services Solutions LLC
4408 Mile Strip Rd #247
Blasdell, NY, 14219 | 7. Discover
2500 Lake Cook Road
Riverwoods, IL 60015 |
| 4. Nancy Isaacson
75 Livingston Ave.
Roseland, NJ, 07068 | |

Michael Siano